

## REMARKS

### **Claims 8, 9 and 21-25 are Allowable**

The Office has rejected claims 8, 9 and 21-26 on page 8 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over United States Patent Publication No. 2002/0191541 (Buchanan et al.) in view of United States Patent Publication No. 2004/0037275 (Li et al.). Applicants respectfully traverse the rejections.

The cited portions of Buchanan et al. and Li et al. do not disclose or suggest the specific combinations of claims 8 or 21. For example, the cited portions of Buchanan et al. and Li et al. do not disclose a system wherein the memory includes virtual routing and forwarding (VRF) to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 8 and 21.

The Examiner notes on page 13 of the Office Action that Buchanan et al. “does not explicitly teach a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers with the same route target (RT) set on one PE share one VRF.” However, according to the Examiner, Buchanan et al.’s failure on this point is resolved by reference called “Benjamin” (not Li et al.). The Examiner says further on page 13 of the Office Action: “Benjamin in the same field of endeavor teaches a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers with the same route target (RT) set on one PE share one VRF (paragraph 0022, figure 2).” The Examiner continues: “It would have been obvious to one having ordinary skill in the art at the time the invention was made to modify Buchanan’s teaching with steps of a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers with the same route target (RT) set on one PE share one VRF as suggested by Benjamin.”

Applicants respectfully disagree with the rejection of claims 8 and 21 under 35 U.S.C. § 103(a) as unpatentable over Buchanan et al. in view of Li et al.

If the Examiner meant to refer to Li et al., instead of “Benjamin” in the Office Action, the Examiner’s citation of “(paragraph 0022, figure 2)” is wrong. Paragraph 0022 of Li et al. says: “Messages can be exchanged among said SPEs, MPEs, and UPEs which connected with each other through MP-BGP (Multi Protocol-Border Gateway Protocol).” Paragraph 0022 of Li et al. fails to disclose a system wherein the memory includes virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as recited in claims 8 and 21. Figure 2 of Li et al. does not remedy this failure. There is no VRF shown in figure 2 of Li et al. Hence, figure 2 of Li et al. does not disclose a system wherein the memory includes virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 8 and 21.

Putting aside the specific reference to “paragraph 0022, figure 2,” a rejection of claim 8 and 21 under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. in view of Li et al. is still not appropriate. According to an electronic search in the USPTO’s patent application database, Li et al. does not use the term “same route” or the word “share.” Thus, Li et al. does not disclose a system wherein the memory includes virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 8 and 21.

Since, as the Examiner notes, Buchanan et al. fail to teach a system wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 8 and 21; and since Li et al. fail to disclose a system wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 8 and 21; the Buchanan et al. and Li et al. combination fails to disclose at least one element of each of claims 8 and 21. Hence, claims 8 and 21 are allowable.

Claim 9 depends from claim 8, which Applicants have shown to be allowable. Accordingly, claim 9 is allowable, at least by virtue of its dependence from claim 8.

Claims 22-25 depend from claim 21, which Applicants have shown to be allowable. Accordingly, claims 22-25 are allowable, at least by virtue of their dependence from claim 21.

**Claims 1-7 are Allowable**

The Office has rejected claims 1, 2, 5 and 6 on page 16 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. in view of United States Patent No. 7,024,472 (Datta et al.). The Office has rejected claims 3 and 4 on page 22 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. and Datta et al. as applied to claim 1 and further in view of United States Patent No. 6,909,696 (Zavgen, Jr.). The Office has rejected claim 7 on page 25 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. and Datta et al. as applied to claim 1 and further in view of United States Patent Publication No. 2003/0079043 (Chang et al.). Applicants respectfully traverse these rejections.

The cited portions of Buchanan et al. do not disclose the specific combination of claim 1. For example, the cited portions of Buchanan et al. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claim 1. The cited portions of Datta et al. make no mention of a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PEs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claim 1. Accordingly, the cited portions of Buchanan et al. and Datta et al. fail to disclose at least one element of claim 1. Hence, claim 1 is allowable.

Claims 2-7 depend from claim 1, which Applicants have shown to be allowable. Accordingly, claims 2-7 are allowable, at least by virtue of their dependence from claim 1.

With regard to claims 3 and 4, the cited portions of Zavgren, Jr. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 3 and 4. Accordingly, claims 3 and 4 include at least one element not disclosed by the cited portions of Buchanan et al., Datta et al. and Zavgren, Jr. Hence, for this additional reason, claims 3-4 are allowable.

With regard to claim 7, the cited portions of Chang et al. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claim 7. Hence, for this additional reason, claim 7 is allowable.

#### **Claims 10-20 are Allowable**

The Office has rejected claims 10, 11, 13, 15, 18 and 19 on page 2 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. The Office has rejected claims 16 and 17 on page 23 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. in view of Zavgren, Jr. The Office has rejected claim 20 on page 26 of the Office Action, under 35 U.S.C. § 103(a) as being unpatentable over Buchanan et al. in view of Chang et al. The Office has rejected claims 12 and 14 on page 27 of the Office Action, as being unpatentable over Buchanan et al. in view of United States Patent Publication 2004/0255028 (Chu et al.). Applicants respectfully traverse these rejections.

The cited portions of Buchanan et al. do not disclose the specific combination of claim 10. For example, the cited portions of Buchanan et al. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claim 10. Hence, the cited portions of Buchanan et al. fail to disclose at least one element of claim 10. Hence, claim 10 is allowable.

Claims 11-20 depend from claim 10, which Applicants have shown to be allowable. Accordingly, claims 11-20 are allowable, at least by virtue of their dependence from claim 10.

With regard to claims 16 and 17, the cited portions of Zavgren, Jr. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 16 and 17. Hence, for this additional reason, claims 16 and 17 are allowable.

With regard to claim 20, the cited portions of Chang et al. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 20. Hence, for this additional reason, claim 20 is allowable.

With regard to claims 12 and 14, the cited portions of Chu et al. do not disclose a method with route targets stored in a memory, wherein the memory includes a virtual routing and forwarding (VRF) element to route target data mapping for each of a plurality of provider edge routers (PCs) and wherein all of the customer edge routers (CEs) with the same route target (RT) set on one PE share one VRF, as in claims 12 and 14. Hence, for this additional reason, claims 12 and 14 are allowable.

### **CONCLUSION**

Applicants have pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the cited portions of the references applied in the Office Action. Accordingly, Applicants respectfully request reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

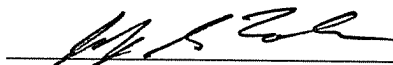
Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

5-17-2008  
Date

  
Jeffrey G. Toler, Reg. No. 38,342  
Attorney for Applicant  
TOLER LAW GROUP  
8500 Bluffstone Cove, Suite A201  
Austin, Texas 78759  
(512) 327-5515 (phone)  
(512) 327-5575 (fax)